



BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

July 22, 2002

REC'D TH
REGULATORY AUTH.
Guy M. Hicks
General Counsel
*02 JUL 22 PM 1 47
OFFICE OF THE
EXECUTIVE SECRETARY
615 214 6301
Fax 615 214 7406

VIA HAND DELIVERY

Hon. Sara Kyle, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *BellSouth Telecommunications, Inc.'s Entry Into Long Distance
(InterLATA) Service in Tennessee Pursuant to Section 271 of
the Telecommunications Act of 1996*
Docket No. 97-00309

Dear Chairman Kyle:

Enclosed are five paper copies and a CD Rom version of BellSouth's Rebuttal
Testimony for the following witnesses:

David Scollard
Keith Milner
Milton McElroy
Al Heartley

Alphonso Varner
Ronald Pate
John Ruscilli
Ken Ainsworth

Proprietary versions of the rebuttal testimony of John Ruscilli and Ken
Ainsworth and the affidavits in Pate Exhibit RMP-1 filed recently with the FCC in
connection with BellSouth's five state application contain proprietary information
and are being submitted under separate cover subject to the terms of the Protective
Order entered in this proceeding.

Copies of the enclosed are being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2002, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

H. LaDon Baltimore, Esquire
Farrar & Bates
211 Seventh Ave. N, # 320
Nashville, TN 37219-1823
don.baltimore@farrar-bates.com
for Qwest (fka LCI), Intermedia,
KMC Telecom III and V

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

Charles B. Welch, Esquire
Farris, Mathews, et al.
618 Church Street, #300
Nashville, TN 37219
cwelch@farrismathews.com
for Time Warner and New South

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
hwalker@boultcummings.com
for XO Communications, ICG,
ACSI (e.spire), Brooks Fiber,
SECCA and US LEC

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

Dulaney O'Roark, Esquire
MCI WorldCom, Inc.
Six Concourse Pkwy, #3200
Atlanta, GA 30328
de.oroark@wcom.com

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

David Eppsteiner
AT&T
1200 Peachtree St., NE, #4068
Atlanta, GA 30367
eppsteiner@att.com
for AT&T and TCG MidSouth

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☒ Mail
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

Enrico C. Soriano
Kelley, Drye & Warren
1200 19th St., NW, #500
Washington, DC 20036
esoriano@kelleydrye.com
for XO Communications

James Wright, Esq.
United Telephone - Southeast
14111 Capitol Blvd.
Wake Forest, NC 27587
james.b.wright@mail.sprint.com
for Sprint Communications, LP

Guilford Thornton, Esquire
Stokes & Bartholomew
424 Church Street
Nashville, TN 37219
gthornton@stokesbartholomew.com
for BSLD

Donald L. Scholes
Branstetter, Kilgore, et al.
227 Second Ave., N.
Nashville, TN 37219
dscholes@branstetterlaw.com
for CWA

Andrew O. Isar, Esquire
ASCENT
7901 Skansie Ave., #240
Gig Harbor, WA 98335
aisar@millerisar.com
for ASCENT

Jon E. Hastings, Esquire
Boult, Cummings, et al.
P. O. Box 198062
Nashville, TN 37219-8062
jhastings@boultcummings.com
for MCI WorldCom

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

☐ Hand
☐ Mail
☐ Facsimile
☒ Overnight
☐ Electronic

Andrew Klein, Esquire
Kelley, Drye & Warren
1200 19th St., NW
Washington, DC 20036
aklein@kelleydrye.com
for KMC Telecom

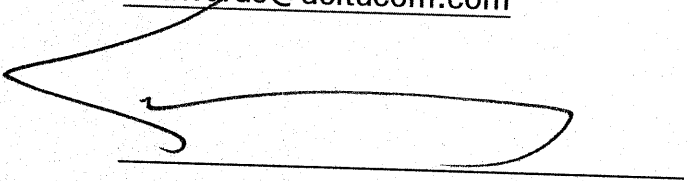
John McLaughlin, Jr.
KMC Telecom
1755 North Brown Road
Lawrenceville, GA 30043
john.mclaughlin@kmctelecom.com

D. Billye Sanders, Esquire
Waller Lansden, et al.
P. O. Box 198866
Nashville, TN 37219-8966
bsanders@wallerlaw.com
for SBC Telecom

Susan Berlin, Esquire
MCI Worldcom, Inc.
Six Concourse Pkwy, #3200
Atlanta, GA 30328
susanberlin@wcom.com

Russell Perkins, Esquire
Consumer Advocate Division
P. O. Box 20207
Nashville, TN 37202
russell.perkins@state.tn.us

Nanette S. Edwards, Esquire
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802
nedwards@deltacom.com



BELLSOUTH TELECOMMUNICATIONS, INC.
REBUTTAL TESTIMONY OF KEN L. AINSWORTH
BEFORE THE TENNESSEE REGULATORY AUTHORITY
DOCKET NO. 97-00309
JULY 22, 2002

Q. STATE YOUR NAME, YOUR BUSINESS ADDRESS, AND YOUR
POSITION WITH BELLSOUTH TELECOMMUNICATIONS, INC.
("BELLSOUTH").

A. My name is Ken L. Ainsworth. My business address is 675 West Peachtree
Street, Atlanta, Georgia 30375. My present title is Director – Interconnection
Operations for BellSouth.

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I have over thirty-six years experience in the telecommunications industry. I am
currently a staff Director for Interconnection Services directly supporting
maintenance, provisioning and indirectly supporting pre-ordering and ordering for
the wholesale market.

Q. HAVE YOUR PREVIOUSLY TESTIFIED BEFORE THE TENNESSEE
REGULATORY AUTHORITY ("THE AUTHORITY")?

A. Yes. I previously testified on December 5, 2001.

1 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

2

3 A. The purpose of my testimony is to respond to the rebuttal testimony of
4 Ms. Denise Berger and Mr. Jay Bradbury on behalf of AT&T, Mr. John Ivanuska
5 on behalf of Birch Telecom and Ms. Mary Conquest on behalf of ITC^DeltaCom.

6

7 Q. PLEASE RESPOND TO PAGE 17 OF MR. JAY BRADBURY'S TESTIMONY
8 REGARDING SERIAL CLARIFICATIONS.

9

10 A. "Serial clarifications" is a term used to describe the situation where BellSouth
11 returns a Local Service Request ("LSR") that a CLEC has submitted more than
12 once for clarification. The CLECs believe that BellSouth should find all errors on
13 the LSR the first time it is reviewed and there should be no "serial clarifications."
14 In this regard, while it is BellSouth's policy to screen the LSR completely and to
15 clarify for all errors on the initial clarification, it sometimes is not possible to do
16 so. For example, if a telephone number or address for the end user is incorrect on
17 the LSR, the BellSouth service representative cannot provide a complete validation
18 that the service requested is available in a central office. If the telephone number
19 is incorrect, the service representative cannot even identify the serving wire center
20 where an address or telephone number would be required. Of course, serial
21 clarifications can also occur if the CLEC creates a secondary error on the
22 correcting LSR. BellSouth does not, however, simply identify one error at a time
23 on an LSR or even stop with the first error identified (assuming it is not something
24 like a wrong telephone number as described above).

25

1 Q. WHAT IS YOUR RESPONSE TO MS. DENISE BERGER'S STATEMENTS
2 ON PAGES 7-8 OF HER TESTIMONY CONCERNING SERVICE
3 INTERRUPTIONS WHEN CUSTOMERS CONVERT TO UNE-P?

4
5 A. Ms. Berger's allegation that "BellSouth continues to have significant problems
6 with its UNE-P product" is unfounded and has been dismissed by the Federal
7 Communications Commission ("FCC"), the Georgia Public Service Commission
8 ("GPSC") and the Louisiana Public Service Commission ("LPSC") in the GA/LA
9 271 approval case.¹ As BellSouth has demonstrated numerous times in prior
10 proceedings, there is not, and never has been, a significant problem with UNE-P
11 conversions utilizing the "D" and "N" order process. Furthermore, Ms. Berger
12 offers no evidence to substantiate her claims. Since June 22, 2001, BellSouth has
13 performed UNE-P service outage analysis associated with conversions. For the
14 time period June 22, 2001 through May 31, 2002, BellSouth has processed
15 approximately 568,102 UNE-P conversion orders using the "D", disconnect, and
16 "N", new, order process. For this period, BellSouth's analysis demonstrates that
17 only 0.25% of the lines converted experienced a service outage as a result of the
18 conversions (See Exhibit KLA-1). Said another way, BellSouth converted
19 99.75% of the lines without a service outage. This analysis substantiates that the
20 performance of BellSouth to migrate UNE-P service does not impede the CLECs'
21 ability to compete. In addition, Mr. Rodney Page, of Access Integrated,
22 confirmed, in his testimony before the Authority in Docket No. 01-00193 on
23 August 22, 2001, that there was not a significant problem with UNE-P
24 conversions. Mr. Page stated that out of 5000-6000 customers converted to

¹ See para. 167 and 168 of GA/LA FCC Order, GA PSC GALA I Comments at 135-136, GA PSC GALA II Comments at 21, SWBT Texas Order, 15 FCC Rcd at 18456-57, par. 199-200, GA PSC GALA I Comments at 103 and LA PSC GALA I at 40-45.

1 Access Integrated in a six-month period, only approximately 36 had their D and N
2 orders separated causing a service outage.

3

4 Q. HAS BELLSOUTH IMPLEMENTED A SINGLE "C" ORDER PROCESS FOR
5 UNE-P CONVERSIONS?

6

7 A. Yes. BellSouth implemented the Single "C" process on March 23, 2002 in
8 Florida, Mississippi, Louisiana and Georgia.

9

10 Q. WHAT EFFECT HAS THIS IMPLEMENTATION HAD ON THE UNE-P
11 CONVERSION RESULTS?

12

13 A. For the time period March 25, 2002 through May 31, 2002, BellSouth has
14 processed approximately 178,655 UNE-P conversion orders using the Single "C"
15 process. For this time period, BellSouth's analysis indicates that only 0.11% of
16 the lines converted experienced a service outage as a result of the conversions
17 (See Exhibit KLA-2). This means that BellSouth converted 99.89% of the lines
18 without a service outage. If you compare the results of the Single "C" against the
19 "D" and "N" process the result was a reduction from 0.25% to 0.11%. The Single
20 "C", therefore, has had a positive impact and even AT&T stated that fact in the
21 Louisiana Workshop on May 21, 2002. Again, the BellSouth analysis and
22 performance substantiates that the CLECs are provided a meaningful opportunity
23 to compete.

24

25

1 Q. DOES BELL SOUTH PLAN TO IMPLEMENT THE SINGLE "C" PROCESS IN
2 TENNESSEE AND THE OTHER STATES IN ITS REGION?

3

4 A. Yes. BellSouth plans to implement the Single "C" process in Alabama and South
5 Carolina during the weekend of July 20, 2002 and in Tennessee, Kentucky and
6 North Carolina during the weekend of August 3, 2002.

7

8 Q. MS. BERGER MENTIONS, ON PAGE 8 OF HER TESTIMONY, PROBLEMS
9 WITH FACILITY CHANGES AND/OR SERVICE REPRESENTATIVE
10 ERRORS ON SOME UNE-P CONVERSIONS. ARE YOU FAMILIAR WITH
11 THESE ISSUES?

12

13 A. Yes. BellSouth has discovered a software problem in the system used for
14 assignment of facilities. This problem affects a very small percentage of the
15 UNE-P orders. BellSouth's analysis for the time period March 25, 2002 through
16 May 31, 2002, indicates that only 0.046% of the conversions processed by the
17 Single "C" order were affected by this problem (See Exhibit KLA-3). As stated,
18 this is a very infrequent occurrence. BellSouth is currently working with the
19 system vendor to identify and implement a fix for this problem. The second
20 UNE-P conversion issue identified by Ms. Berger is a service representative error.
21 BellSouth is not perfect and realizes no matter how diligent our focus that service
22 order errors will occur from time to time. However, as the comparison of the
23 Single "C" with the "D" and "N" process indicates these occurrences have also
24 been reduced. As Ms. Berger is aware, BellSouth analyzed approximately ***
25 *** UNE-P orders completed for AT&T from March 25, 2002 to April 30, 2002.

1 The analysis indicates that ***%*** of those orders were completed without a
2 service outage. This amounted to only ***** lines on ***** service orders.
3 *** *** of the service orders were affected by service representative error and
4 ***** were affected by the facility reassignment problem. This analysis is
5 consistent with the overall CLEC analysis explained above. BellSouth strives to
6 provide excellent service and will continue to focus on service representative
7 quality and system enhancements to improve the quality of service provided by
8 BellSouth.

9

10 Q. SHOULD THE AUTHORITY GIVE ANY MERIT TO THE ISSUES RAISED
11 BY MS. BERGER IN ITS SECTION 271 EVALUATIONS?

12

13 A. No. As I have explained above, BellSouth has an impressive track record in
14 performing UNE-P conversions. BellSouth has demonstrated that the percentage
15 of lines that experience problems with conversions has always been very small.
16 In addition, BellSouth has shown its willingness to pursue system and process
17 changes to even further decrease the few sporadic problems that exist.

18

19 Q. PLEASE RESPOND TO PAGES 4-13 OF BIRCH'S COMMENTS BEFORE
20 THE FCC RELATED TO "PHANTOM DSL USOCs" AND "VIRTUAL
21 CRAMMING" ALLEGATIONS.

22

23 A. Contrary to allegations by several CLECs, BellSouth does not place inappropriate
24 DSL USOCs on customer records. The DSL USOC is not put on a Customer
25 Service Record ("CSR") unless the Network Service Provider ("NSP") requests

1 an order to be processed in Service Order Entry Gateway (“SOEG”). Because the
2 high speed Internet access service is provided by the NSP, time delays and gaps
3 can be created between organizations and companies as a result of the multiple
4 connections and disconnections that must be accomplished that have nothing to
5 do with a failure on BellSouth’s part.

6
7 There are two typical scenarios where the DSL USOC might appear on the end
8 user’s CSR, but no DSL based Internet access service is being provided to the
9 end-user. The first scenario is where BellSouth has provisioned the tariffed DSL
10 service to the NSP, but the end-user service has not been completed by the NSP
11 (including BellSouth’s own FastAccess® Service).² The second scenario is
12 where the end-user has disconnected his or her Internet access service with the
13 NSP, but the NSP, or BellSouth, has not completed the subsequent disconnect of
14 the tariffed DSL service. Ultimately, either situation could lead to a DSL USOC
15 being present on the CSR and result in a clarification back to the CLEC, even
16 though the end-user in either instance may say that he or she does not have DSL
17 service on his or her line.

18
19 In order to assess the impact of this issue, BellSouth has reviewed its DSL service
20 records and the clarifications returned to CLECs for DSL USOCs on the end-

² For example, under its current provisioning process BellSouth activates its FastAccess® service automatically after the end-user receives the DSL modem. This activation could occur several days after BellSouth equips the line with tariffed DSL service and places the DSL USOC on the end-user’s CSR. Under procedures that were discontinued in October 2001, BellSouth did not activate its FastAccess® service until the end user “registered” through successful installation and activation of the DSL modem. If the end-user was not successful in attempts to install and activate the modem, BellSouth would not have initiated the FastAccess® service. In some instances this condition did occur but was not immediately recognized by BellSouth, resulting in its failure to pass a subsequent order disconnecting the tariffed DSL service and removing the USOC for the tariffed DSL service from the line.

1 user's CSR. This analysis shows that the situation where the CLEC order is
2 clarified and the end-user is not actively using or provisioning DSL (new orders
3 or disconnects) rarely occurs.

4
5 In January of 2002, 434,840 non-LNP LSRs were electronically submitted by
6 CLECs, of which 67,914 involved UNE-P conversions. Of these LSRs submitted
7 in January 2002, only 49,661 were auto-clarified for any reason (including the
8 DSL USOC on the end-user line). Of the 49,661 that were auto-clarified, 1,069
9 were auto-clarified for DSL service on the end-user line – which equates to just
10 over 2% of the total orders auto-clarified and less than 1.58% of UNE-P
11 conversions. Of the 1,069 DSL clarified orders, only 251 were auto-clarified for
12 DSL service on the end-user's line when the end-user either did not have working
13 high speed Internet access service, or was actively involved in adding or
14 disconnecting the DSL service, which equates to approximately 0.37% of total
15 UNE-P conversions for the month of January 2002. Thus, the problem about
16 which the CLECs complain is not significant.

17
18 Q. PLEASE REPLY TO PAGE 13 OF BIRCH'S COMMENTS REGARDING DSL
19 ON THE CUSTOMER'S MAIN TELEPHONE NUMBER.

20
21 A. CLECs also allege that BellSouth has a "policy" of placing its FastAccess®
22 service on the customer's main billing telephone line, or the main line of a hunt
23 group. This allegation is not true. In fact, BellSouth policy permits the end-user
24 to place DSL service on any customer requested line that currently qualifies.
25 Thus, the sales training used by BellSouth FastAccess® sales agents prompts the

1 agent to ask the customer which phone number the customer would like to use for
2 its service. If the telephone number provided by the customer qualifies for DSL,
3 then the agent is instructed to place the DSL order on the line requested by the
4 customer. Moreover, if the first choice of the customer does not currently qualify
5 for DSL service, the sales agent usually will recommend provisioning the DSL
6 service on the customer's fax line (assuming that the fax line qualifies for DSL
7 service). Because of the concern about this issue, however, BellSouth has
8 recently sent additional information re-iterating its policy to the BellSouth
9 business sales offices. Of course, BellSouth has no knowledge or control over the
10 sales practices of other NSPs that purchase BellSouth's tariffed DSL service.
11 Furthermore, when a customer chooses to use a facilities-based CLEC but still
12 wants BellSouth to provide DSL service, the end-user can keep all but one line
13 with the facilities-based CLEC. The remaining line needed for BellSouth DSL
14 service must be a CLEC resold line, or a BellSouth voice line. BellSouth does not
15 stipulate which line is required for DSL service, but simply uses the line the
16 customer or the CLEC chooses.

17
18 Q. IN AN EFFORT TO BE RESPONSIVE TO CLEC CONCERNS, HAS
19 BELLSOUTH ALLOCATED THE REQUISITE RESOURCES TO
20 IMPLEMENT AN EFFECTIVE PROCESS TO REMOVE DSL USOCs FROM
21 THE CUSTOMER'S ACCOUNT?

22
23 A. Yes. BellSouth has allocated resources in an interim process to effectively
24 remove the DSL USOC. BellSouth has established a special contact group in the
25 Fleming Island Local Carrier Service Center ("LCSC") for CLECs contact to

1 facilitate removal of the DSL USOC. The LCSC group will remove the DSL
2 USOC from the Customer Service Record for the CLEC to ensure that the
3 CLEC's LSR will flow through the system. BellSouth has processed *****
4 DSL USOC removal requests from all CLECs in the period April 1, 2002 through
5 July 17, 2002. This is an average of ***** requests per month. These figures
6 confirm the fact that there are a small number of orders that actually appear to
7 have a DSL USOC on the Customer Service Record. Moreover, as Birch is well
8 aware, BellSouth is implementing an electronic resolution of this issue, whereby
9 the system will automatically strip DSL USOCs, in the December 11.0 Release.
10 BellSouth is incurring the expense to mechanize this process despite the low
11 number of orders affected.

12
13 Q. ON PAGES 16-20 BIRCH ADDRESSES PENDING SERVICE ORDERS
14 ("PSOs"). PLEASE EXPLAIN PSOs AND ITS PROCESS.

15
16 A. A PSO is any customer service request that resides in BellSouth's ordering
17 systems. These service orders remain in a pending status until the service activity
18 requested is completed. The service order is then completed and posts to the CSR
19 or, in the case of a disconnect, is removed from the active account records.
20 Examples of PSOs are new connects, transfers, additional services or features,
21 denials, restorals, PIC change and disconnects. A PSO indicator can be viewed
22 by a CLEC from the CSR.

23
24 If a service request is received from a CLEC while a PSO exists, the new request
25 is routed to the LCSC for handling. If the new service request is not in conflict

1 with the PSO, the LCSC will process the request. Otherwise, the new service
2 request will be clarified back to the CLEC to work with their potential customer
3 in resolving the conflict.

4
5 Q. CAN YOU EXPLAIN WHAT BIRCH DESCRIBES ON PAGE 16 AS THE
6 “MYSTERIOUS PRESENCE OF PENDING SERVICE ORDERS”?

7
8 A. There is no such thing as a “mysterious” PSO. BellSouth places a PSO indicator
9 on the CSRs anytime a service request has been entered into BellSouth’s ordering
10 systems. These service orders could be received at any time including the period
11 between the time the CLEC reviews the account and the time the CLEC actually
12 submits an LSR. Customers have the opportunity to make service changes at any
13 time to their accounts. Therefore, there is ample opportunity for a PSO to be
14 issued after a CLEC sales contact and prior to an actual CLEC LSR being issued.
15 There are numerous reasons for requests from end-users to their LSP (CLEC or
16 BellSouth) for changes to existing service such as adding additional lines,
17 disconnects, inside wire request, change LSPs or premise location moves.
18 Additionally, the PSO may be the LSP requesting different service arrangements,
19 non-pay denials or service restorals. Birch should understand these possibilities
20 and the fact that PSOs can have a major impact on the end-user if not handled
21 properly. These activities are certainly not mysterious but rather a part of the
22 ordering process.

23
24 Q. WHEN A NEW SERVICE REQUEST IS BEING GENERATED IS THE
25 PRESENCE OF AN EXISTING PSO UNUSUAL?

1

2 A. No. The encountering of PSOs can occur during service migration or during any
3 other service order requests. I have described what PSOs are, why they could be
4 present in the ordering systems, and why the TRA should reject Birch's assertions
5 that service order activity should not occur prior to their issuance of their service
6 request. There are many instances when this could occur. In fact, one of the
7 occurrences that Birch has characterized as a "mysterious" PSO is an example of
8 such an instance. Specifically, Birch initiated an order to remove a PIC freeze on
9 a pending conversion to Birch. Until an order is placed into the ordering system
10 there is opportunity for additional service order activity to occur. According to
11 Birch's own documentation, a time lapse occurs from the time their sales
12 organization views the CSR to the time the provisioning representative views the
13 CSR. It is possible for an end user to have a service order issued on their account
14 in that time frame.

15

16 Q. HOW WOULD YOU RESPOND TO BIRCH'S ASSERTION ON PAGES 17
17 AND 18 THAT PENDING SERVICE ORDERS APPEAR ON THE
18 CUSTOMER SERVICE RECORD/ACCOUNT THAT WERE NOT
19 REQUESTED BY THE END USER?

20

21 A. I have related instances of why PSOs occur. In some instances request for denial,
22 restoral or disconnect would be issued by a CLEC or BellSouth. These could
23 occur without a direct request by the migrating customer. Also, in the two
24 examples provided by Birch in Attachment 6 and Attachment 7, BellSouth
25 records indicate that the migrating customer did in fact make a request to

1 BellSouth that caused additional service order activity. While BellSouth has not
2 had the opportunity to investigate every example, these two indicate the fallacy of
3 Birch's position (see Exhibits KLA-4 and KLA-5).

4
5 Q. CAN YOU COMMENT ON BIRCH'S ACCUSATION (PAGE 18) OF THE
6 POSSIBILITY THAT BELL SOUTH MONITORS CSRs THAT ARE PULLED
7 BY CLECS?

8
9 A. BellSouth does not monitor CSRs that are pulled by CLECs. In fact, to expend
10 the resources to review hundreds of thousands of daily CSR inquiries, contact a
11 customer in a time frame before the CLEC could process an order, and actually
12 process an order is not even practical. BellSouth can only speculate that Birch
13 would prefer that BellSouth process migration orders with PSOs without concern
14 for the impact to the customer.

15
16 Q. HAVE CLECS PREVIOUSLY SUGGESTED ALTERNATIVES TO
17 HANDLING PSOs?

18
19 A. Yes. In fact, a suggestion was made to simply cancel all PSOs and work the LSR.
20 However, this may not be in the best interest of a migrating customer. As an
21 example, if an end user has requested that an additional line be added to their
22 BellSouth Retail account and then an LSR is received to convert that end user to a
23 CLEC, the CLEC request would not include the additional line since it was not on
24 the CSR at the time they submitted their LSR. Canceling the order for the
25 additional line would delay end user service or cause the end user to migrate

1 incomplete service. Also, BellSouth and the CLECs need to know what the
2 individual end user desires so the appropriate service orders are processed. Other
3 situations to be considered include PSOs to migrate the end user to CLEC A.
4 BellSouth then receives an LSR to migrate the end user to CLEC B. Currently
5 BellSouth would clarify the LSR back to CLEC B due to the PSOs. If BellSouth
6 simply cancels all PSOs as suggested, the migrating customer may not convert to
7 the provider of choice. These issues should be resolved before BellSouth works
8 an LSR, and again they are examples of orders that can occur between the time a
9 CLEC makes a sales contact with an end user and the time BellSouth receives an
10 LSR from the CLEC.

11
12 Q. WOULD BELL SOUTH RECOMMEND A CHANGE TO THE CURRENT
13 PENDING ORDER PROCESS?

14
15 A. No. BellSouth knows this is a complex issue and without PSO resolution, there
16 could be negative end-user impacts. BellSouth also believes various CLECs have
17 differing opinions on how this process could be improved to reduce migration
18 delays. While BellSouth has no formal recommendation, BellSouth believes the
19 CLECs should use the Change Control Process (“CCP”) to explore any suggested
20 improvements to the current process to ensure that all the different CLEC views
21 are taken into account.

22
23 Q. PLEASE RESPOND TO THE TESTIMONY OF MARY CONQUEST ON
24 PAGES 2-3 FILED BY ITC^DELTACOM THAT BELL SOUTH’S

1 OPERATIONS SUPPORT SYSTEMS (“OSS”) PROVIDE DISCRIMINATORY
2 ACCESS TO PENDING SERVICE ORDERS.

3
4 A. ITC^DeltaCom can view any PSO on its own end user accounts. It cannot view a
5 service order on BellSouth retail or other CLEC’s end user accounts. A BellSouth
6 retail service representative can view a PSO on a BellSouth retail end-user
7 account. While it is technically possible for BellSouth retail representatives to
8 view other CLEC PSOs, we have CPNI obligations and administrative safeguards
9 as a preventative.

10
11 The LCSC service representatives can view PSOs for CLEC and BellSouth end
12 users. The LCSC is the contact for all CLECs, and must be able to access all end
13 user records to discuss any issue with the CLEC. The recommendation to gain
14 access to all CSRs and PSOs regardless of the LSP would require a substantial
15 change in the current process and systems. BellSouth supports Ms. Conquest’s
16 efforts to position this issue through the CCP forum. All CLECs would need an
17 opportunity to vote and agree with other CLEC’s having global access to CSRs
18 and PSOs.

19
20 Q. IS THERE ANY OTHER INFORMATION THAT YOU WOULD LIKE TO
21 PRESENT IN THIS PROCEEDING?

22
23 A. Yes. All of the things I have been discussing are matters that the CLECs have
24 raised time and again in other state proceedings and at the FCC. In order to
25 provide the Authority with even more detail about these matters, I have attached

1 as Exhibit KLA-6 my affidavit touching on these subjects that was filed with the
2 FCC on June 20, 2002 in support of BellSouth's application to provide Long
3 Distance service in Alabama, Kentucky, Mississippi, North Carolina and South
4 Carolina.

5

6 Q. BOTH THIS TESTIMONY AND THE AFFIDAVIT YOU JUST MENTIONED
7 MAKE REFERENCE TO MANY ACRONYMS. DO YOU HAVE A LIST OF
8 THOSE ACRONYMS?

9

10 A. Yes. I have attached a list of acronyms to my testimony for the Authority's
11 information. Please see Exhibit KLA-7. Also, there is an additional acronym list
12 attached to my 5-state filing with the FCC on June 20, 2002 (see Exhibit KLA-6).

13

14 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

15

16 A. Yes.

17

18

19

20

21

22

23

24

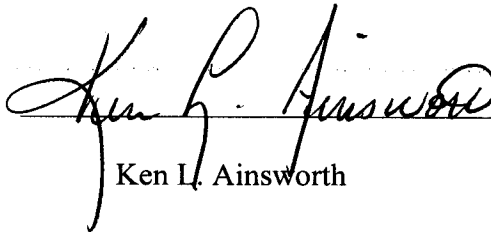
25

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared Ken L. Ainsworth –Director – Interconnection Operations, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 97-00309 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 16 pages and 7 exhibit(s).


Ken L. Ainsworth

Sworn to and subscribed
before me on July 22, 2002


NOTARY PUBLIC

Notary Public, Gwinnett County, Georgia
My Commission Expires June 27, 2005

**Tennessee Regulatory Authority
Docket No. 97-00309
Exhibit KLA-1**

Transmittal Cover sheet for Ainsworth Exhibit KLA-1

UNE-P Conversion Analysis
N D Order Process

KLA-1

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
06/22/2001	1796	90	0	0.00%
06/23/2024	284	18	0	0.00%
06/25/2001	1934	88	2	0.10%
06/26/2001	2725	88	9	0.33%
06/27/2001	1568	88	3	0.19%
06/28/2001	1842	76	7	0.38%
06/29/2001	1900	80	4	0.21%
07/02/2001	2050	121	7	0.34%
07/03/2001	1473	45	3	0.20%
07/05/2001	1561	106	7	0.45%
07/06/2001	1393	71	1	0.07%
07/07/2001	616	35	5	0.81%
07/09/2001	1419	101	2	0.14%
07/10/2001	2128	104	3	0.14%
07/11/2001	1585	76	4	0.25%
07/12/2001	1959	80	2	0.10%
07/13/2001	2032	55	3	0.15%
07/14/2001	187	11	0	0.00%
07/15/2001	44	6	1	2.27%
07/16/2001	2984	99	10	0.34%
07/17/2001	3121	117	4	0.13%
07/18/2001	3116	97	5	0.16%
07/19/2001	2297	99	2	0.09%
07/20/2001	1743	73	7	0.40%
07/21/2001	400	17	0	0.00%
07/22/2001	30	4	0	0.00%
07/23/2001	1783	53	2	0.11%
07/24/2001	3693	92	6	0.16%
07/25/2001	2201	72	1	0.05%
07/26/2001	2273	87	4	0.18%
07/27/2001	1804	75	6	0.33%
07/28/2001	156	9	0	0.00%
07/29/2001	147	9	2	1.36%
07/30/2001	2131	88	5	0.23%
07/31/2001	3089	72	3	0.10%
08/01/2001	2621	76	4	0.15%
08/02/2001	2133	75	6	0.28%
08/03/2001	2165	79	0	0.00%
08/04/2001	204	11	0	0.00%
08/05/2001	13	0	0	0.00%
08/06/2001	2077	59	4	0.19%
08/07/2001	3374	102	5	0.15%
08/08/2001	2448	76	5	0.20%
08/09/2001	1887	81	5	0.26%
08/10/2001	2073	37	1	0.05%
08/11/2001	249	4	1	0.40%
08/12/2001	0	0	0	0.00%
08/13/2001	2437	88	7	0.29%
08/14/2001	2421	88	4	0.17%

UNE-P Conversion Analysis
N D Order Process

KLA-1

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
08/15/2001	2855	83	4	0.14%
08/16/2001	2180	75	4	0.18%
08/17/2001	1860	74	2	0.11%
08/18/2001	91	5	0	0.00%
08/19/2001	14	1	0	0.00%
08/20/2001	1910	80	4	0.21%
08/21/2001	2304	77	3	0.13%
08/22/2001	2508	80	9	0.36%
08/23/2001	1638	74	4	0.24%
08/24/2001	2050	72	6	0.29%
08/25/2001	106	5	0	0.00%
08/26/2001	0	0	0	0.00%
08/27/2001	2556	70	5	0.20%
08/28/2001	3851	102	3	0.08%
08/29/2001	2120	74	5	0.24%
08/30/2001	2249	53	1	0.04%
08/31/2001	2021	59	4	0.20%
09/01/2001	62	8	1	1.61%
09/02/2001	0	0	0	0.00%
09/03/2001	70	4	0	0.00%
09/04/2001	1680	52	4	0.24%
09/05/2001	2349	64	2	0.09%
09/06/2001	1454	53	2	0.14%
09/07/2001	1755	58	5	0.28%
09/08/2001	176	9	0	0.00%
09/09/2001	4	1	0	0.00%
09/10/2001	1751	68	4	0.23%
09/11/2001	2589	86	3	0.12%
09/12/2001	1021	39	3	0.29%
09/13/2001	1358	41	1	0.07%
09/14/2001	1498	88	9	0.60%
09/15/2001	87	1	0	0.00%
09/16/2001	0	0	0	0.00%
09/17/2001	1987	97	6	0.30%
09/18/2001	3667	107	3	0.08%
09/19/2001	1285	42	1	0.08%
09/20/2001	1965	66	3	0.15%
09/21/2001	2301	68	3	0.13%
09/22/2001	193	5	0	0.00%
09/23/2001	0	0	0	0.00%
09/24/2001	1985	64	8	0.40%
09/25/2001	2893	96	8	0.28%
09/26/2001	1608	47	6	0.37%
09/27/2001	1514	50	1	0.07%
09/28/2001	1738	75	3	0.17%
09/29/2001	110	5	0	0.00%
09/30/2001	195	9	2	1.03%
10/01/2001	1804	69	5	0.28%
10/02/2001	1889	65	4	0.21%

UNE-P Conversion Analysis
N D Order Process

KLA-1

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
10/03/2001	1659	59	1	0.06%
10/04/2001	1585	63	4	0.25%
10/05/2001	2012	64	3	0.15%
10/06/2001	229	10	2	0.87%
10/07/2001	54	2	0	0.00%
10/08/2001	1665	46	0	0.00%
10/09/2001	2309	51	3	0.13%
10/10/2001	2002	40	5	0.25%
10/11/2001	1501	49	2	0.13%
10/12/2001	1791	53	4	0.22%
10/13/2001	219	9	1	0.46%
10/14/2001	6	1	0	0.00%
10/15/2001	1643	62	5	0.30%
10/16/2001	1973	75	4	0.20%
10/17/2001	1324	66	17	1.28%
10/18/2001	1499	64	8	0.53%
10/19/2001	1685	80	10	0.59%
10/20/2001	226	17	1	0.44%
10/21/2001	9	0	0	0.00%
10/22/2001	1521	68	2	0.13%
10/23/2001	1537	63	6	0.39%
10/24/2001	1950	72	10	0.51%
10/25/2001	1599	78	8	0.50%
10/26/2001	1819	90	4	0.22%
10/27/2001	223	6	0	0.00%
10/28/2001	0	0	0	0.00%
10/29/2001	1116	66	4	0.36%
10/30/2001	1492	78	11	0.74%
10/31/2001	1258	47	5	0.40%
11/01/2001	1642	43	6	0.37%
11/02/2001	1577	95	9	0.57%
11/03/2001	205	3	0	0.00%
11/04/2001	45	1	0	0.00%
11/05/2001	1419	91	10	0.70%
11/06/2001	2380	72	10	0.42%
11/07/2001	1340	87	6	0.45%
11/08/2001	1873	78	8	0.43%
11/09/2001	2423	97	9	0.37%
11/10/2001	161	6	0	0.00%
11/11/2001	83	0	0	0.00%
11/12/2001	2011	52	4	0.20%
11/13/2001	2082	76	5	0.24%
11/14/2001	1687	60	4	0.24%
11/15/2001	1586	57	11	0.69%
11/16/2001	1579	41	2	0.13%
11/17/2001	206	1	0	0.00%
11/18/2001	0	0	0	0.00%
11/19/2001	1745	56	5	0.29%
11/20/2001	2179	59	8	0.37%

UNE-P Conversion Analysis
N D Order Process

KLA-1

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
11/21/2001	1425	62	10	0.70%
11/22/2001	50	0	0	0.00%
11/23/2001	770	22	3	0.39%
11/24/2001	79	4	2	2.53%
11/25/2001	0	0	0	0.00%
11/26/2001	1487	74	10	0.67%
11/27/2001	1268	42	4	0.32%
11/28/2001	1358	69	22	1.62%
11/29/2001	1721	74	9	0.52%
11/30/2001	1802	90	17	0.94%
12/01/2001	490	17	6	1.22%
12/02/2001	0	0	0	0.00%
12/03/2001	2384	100	9	0.38%
12/04/2001	1982	62	11	0.55%
12/05/2001	2876	145	39	1.36%
12/06/2001	2839	119	24	0.85%
12/07/2001	2970	71	13	0.44%
12/08/2001	446	21	4	0.90%
12/09/2001	5	0	0	0.00%
12/10/2001	2777	70	11	0.40%
12/11/2001	2948	91	7	0.24%
12/12/2001	2490	58	6	0.24%
12/13/2001	2683	73	6	0.22%
12/14/2001	2458	65	3	0.12%
12/15/2001	292	7	2	0.68%
12/16/2001	0	0	0	0.00%
12/17/2001	2247	69	12	0.53%
12/18/2001	2194	23	2	0.09%
12/19/2001	1885	32	3	0.16%
12/20/2001	1700	30	4	0.24%
12/21/2001	1867	25	4	0.21%
12/22/2001	130	3	0	0.00%
12/23/2001	0	0	0	0.00%
12/24/2001	1076	27	0	0.00%
12/25/2001	0	0	0	0.00%
12/26/2001	1895	27	4	0.21%
12/27/2001	1160	11	2	0.17%
12/28/2001	1283	36	3	0.23%
12/29/2001	222	7	1	0.45%
12/30/2001	0	0	0	0.00%
12/31/2001	1295	12	0	0.00%
01/01/2002	0	0	0	0.00%
01/02/2002	1333	36	9	0.68%
01/03/2002	834	32	4	0.48%
01/04/2002	1359	31	21	1.55%
01/05/2002	213	2	0	0.00%
01/06/2002	0	0	0	0.00%
01/07/2002	1596	53	2	0.13%
01/08/2002	2242	73	2	0.09%

UNE-P Conversion Analysis
N D Order Process

KLA-1

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
01/09/2002	2178	93	3	0.14%
01/10/2002	6238	172	27	0.43%
01/11/2002	2229	122	24	1.08%
01/12/2002	767	35	2	0.26%
01/13/2002	33	2	0	0.00%
01/14/2002	5317	170	7	0.13%
01/15/2002	3855	96	15	0.39%
01/16/2002	3377	69	5	0.15%
01/17/2002	5783	116	7	0.12%
01/18/2002	3154	67	2	0.06%
01/19/2002	735	16	0	0.00%
01/20/2002	67	2	0	0.00%
01/21/2002	3850	85	6	0.16%
01/22/2002	5337	109	5	0.09%
01/23/2002	2296	92	4	0.17%
01/24/2002	1811	75	4	0.22%
01/25/2002	1630	88	5	0.31%
01/26/2002	157	5	0	0.00%
01/28/2002	4468	138	7	0.16%
01/29/2002	7245	151	4	0.06%
01/30/2002	4795	127	21	0.44%
01/31/2002	1904	64	11	0.58%
02/01/2002	1778	57	4	0.22%
02/02/2002	178	7	3	1.69%
02/03/2002	0	0	0	0.00%
02/04/2002	4439	44	10	0.23%
02/05/2002	2145	74	4	0.19%
02/06/2002	3552	100	9	0.25%
02/07/2002	3877	114	5	0.13%
02/08/2002	4132	96	6	0.15%
02/09/2002	885	16	0	0.00%
02/11/2002	7573	124	7	0.09%
02/12/2002	6918	144	3	0.04%
02/13/2002	2262	81	7	0.31%
02/14/2002	6821	140	7	0.10%
02/15/2002	7524	213	8	0.11%
02/16/2002	888	31	2	0.23%
02/17/2002	0	0	0	0.00%
02/18/2002	6299	143	6	0.10%
02/19/2002	2088	67	12	0.57%
02/20/2002	1365	79	18	1.32%
02/21/2002	1239	51	1	0.08%
02/22/2002	1431	63	0	0.00%
02/23/2002	430	19	0	0.00%
02/25/2002	4747	143	5	0.11%
02/26/2002	1937	118	5	0.26%
02/27/2002	7125	181	9	0.13%
02/28/2002	3465	94	7	0.20%
03/01/2002	8949	236	7	0.08%

UNE-P Conversion Analysis
N D Order Process

KLA-1

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
03/02/2002	288	38	16	5.56%
03/04/2002	8609	223	9	0.10%
03/05/2002	8920	161	1	0.01%
03/06/2002	7795	159	7	0.09%
03/07/2002	10308	205	17	0.16%
03/08/2002	10283	270	9	0.09%
03/09/2002	352	8	0	0.00%
03/11/2002	10125	191	15	0.15%
03/12/2002	9653	205	13	0.13%
03/13/2002	6350	158	11	0.17%
03/14/2002	1686	70	10	0.59%
03/15/2002	1686	56	4	0.24%
03/16/2002	281	28	1	0.36%
03/18/2002	2198	62	1	0.05%
03/19/2002	2535	56	4	0.16%
03/20/2002	2194	86	10	0.46%
03/21/2002	2096	78	3	0.14%
03/22/2002	2173	69	3	0.14%
03/23/2002	404	22	3	0.74%
03/25/2002	1965	68	3	0.15%
03/26/2002	1563	54	3	0.19%
03/27/2002	1558	55	6	0.39%
03/28/2002	847	40	6	0.71%
03/29/2002	573	33	2	0.35%
03/30/2002	298	0	0	0.00%
03/31/2002	3	1	0	0.00%
04/01/2002	904	48	8	0.88%
04/02/2002	708	27	1	0.14%
04/03/2002	704	21	0	0.00%
04/04/2002	520	29	2	0.38%
04/05/2002	547	40	3	0.55%
04/06/2002	201	12	0	0.00%
04/07/2002	4	2	0	0.00%
04/08/2002	649	29	1	0.15%
04/09/2002	904	33	0	0.00%
04/10/2002	628	40	5	0.80%
04/11/2002	808	28	0	0.00%
04/12/2002	575	20	2	0.35%
04/13/2002	181	6	0	0.00%
04/14/2002	1	4	0	0.00%
04/15/2002	599	21	7	1.17%
04/16/2002	682	32	1	0.15%
04/17/2002	680	46	3	0.44%
04/18/2002	493	25	2	0.41%
04/19/2002	548	27	1	0.18%
04/20/2002	130	4	0	0.00%
04/21/2002	0	0	0	0.00%
04/22/2002	714	25	3	0.42%
04/23/2002	690	42	1	0.14%

UNE-P Conversion Analysis
N D Order Process

KLA-1

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
04/24/2002	746	29	4	0.54%
04/25/2002	544	41	1	0.18%
04/26/2002	791	26	2	0.25%
04/27/2002	151	4	0	0.00%
04/28/2002	38	1	0	0.00%
04/29/2002	656	24	0	0.00%
04/30/2002	449	32	4	0.89%
05/01/2002	475	21	0	0.00%
05/02/2002	495	30	0	0.00%
05/03/2002	653	42	3	0.46%
05/04/2002	88	4	0	0.00%
05/05/2002	4	1	0	0.00%
05/06/2002	624	42	3	0.48%
05/07/2002	685	45	0	0.00%
05/08/2002	956	50	2	0.21%
05/09/2002	1300	52	2	0.15%
05/10/2002	945	94	8	0.85%
05/11/2002	244	7	1	0.41%
05/12/2002	0	0	0	0.00%
05/13/2002	910	38	8	0.88%
05/14/2002	760	36	4	0.53%
05/15/2002	1030	34	1	0.10%
05/16/2002	1138	42	4	0.35%
05/17/2002	750	37	3	0.40%
05/18/2002	216	4	0	0.00%
05/19/2002	0	0	0	0.00%
05/20/2002	669	11	1	0.15%
05/21/2002	447	27	9	2.01%
05/22/2002	622	42	4	0.64%
05/23/2002	970	43	3	0.31%
05/24/2002	691	42	2	0.29%
05/25/2002	254	5	1	0.39%
05/26/2002	0	0	0	0.00%
05/27/2002	95	4	1	1.05%
05/28/2002	804	25	5	0.62%
05/29/2002	1044	30	8	0.77%
05/30/2002	1905	121	17	0.89%
05/31/2002	940	41	3	0.32%
	568102	18231	1416	0.25%

Tennessee Regulatory Authority
Docket No. 97-00309
Exhibit KLA-5

Transmittal Cover sheet for Ainsworth Exhibit KLA-5

PUBLIC VERSION
(DOCUMENT IS PROPRIETARY)

**Tennessee Regulatory Authority
Docket No. 97-00309
Exhibit KLA-4**

Transmittal Cover sheet for Ainsworth Exhibit KLA-4

**PUBLIC VERSION
(DOCUMENT IS PROPRIETARY)**

**Tennessee Regulatory Authority
Docket No. 97-00309
Exhibit KLA-3**

Transmittal Cover sheet for Ainsworth Exhibit KLA-3

Single C Facility Caused Outage Summary Data 3/25/02 Thru 5/31/02		
Outage Reason	Quantity	Percentage of Order Volume
Facility Only Change	13	0.007%
OE only Change	28	0.016%
Facility and OE change	39	0.022%
Cross Aisle Tie Pairs Change	2	0.001%
Total	82	0.046%

**Tennessee Regulatory Authority
Docket No. 97-00309
Exhibit KLA-2**

Transmittal Cover sheet for Ainsworth Exhibit KLA-2

UNE-P CONVERSION
SINGLE-C ORDER PROCESS

KLA-2

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
03/25/2002	175	19	2	1.14%
03/26/2002	294	11	0	0.00%
03/27/2002	1087	18	1	0.09%
03/28/2002	944	26	0	0.00%
03/29/2002	1607	47	0	0.00%
03/30/2002	428	8	0	0.00%
03/31/2002	0	0	0	0.00%
04/01/2002	1397	42	0	0.00%
04/02/2002	1070	62	10	0.93%
04/03/2002	1212	31	2	0.17%
04/04/2002	1295	44	0	0.00%
04/05/2002	1905	66	4	0.21%
04/06/2002	140	17	1	0.71%
04/07/2002	0	0	0	0.00%
04/08/2002	1174	41	4	0.34%
04/09/2002	2042	49	1	0.05%
04/10/2002	2711	83	1	0.04%
04/11/2002	4426	127	2	0.05%
04/12/2002	4205	119	6	0.14%
04/13/2002	252	11	0	0.00%
04/14/2002	0	0	0	0.00%
04/15/2002	4485	99	2	0.04%
04/16/2002	5027	111	2	0.04%
04/17/2002	5260	112	2	0.04%
04/18/2002	4442	98	2	0.05%
04/19/2002	4535	109	2	0.04%
04/20/2002	219	7	0	0.00%
04/21/2002	8	1	0	0.00%
04/22/2002	5353	101	1	0.02%
04/23/2002	4911	105	7	0.14%
04/24/2002	5216	106	2	0.04%
04/25/2002	4467	121	1	0.02%
04/26/2002	4977	100	1	0.02%
04/27/2002	242	5	0	0.00%
04/28/2002	16	0	0	0.00%
04/29/2002	4967	158	18	0.36%
04/30/2002	3112	58	2	0.06%
05/01/2002	2591	67	3	0.12%
05/02/2002	4737	109	2	0.04%
05/03/2002	5426	118	0	0.00%
05/04/2002	175	1	0	0.00%
05/05/2002	75	1	0	0.00%
05/06/2002	6094	143	7	0.11%
05/07/2002	4986	131	2	0.04%
05/08/2002	4020	82	2	0.05%
05/09/2002	5650	153	1	0.02%
05/10/2002	7015	167	6	0.09%

UNE-P CONVERSION
SINGLE-C ORDER PROCESS

KLA-2

Date Service Orders Completed	Total Order Volume	Total Troubles Reviewed	Out Of Service due to Conversion	Percentage Out of Service Due to Conversion
05/11/2002	146	2	0	0.00%
05/12/2002	0	0	0	0.00%
05/13/2002	6148	156	3	0.05%
05/14/2002	6195	173	24	0.39%
05/15/2002	8053	204	10	0.12%
05/16/2002	6807	165	3	0.04%
05/17/2002	2844	62	0	0.00%
05/18/2002	212	20	0	0.00%
05/19/2002	0	0	0	0.00%
05/20/2002	2791	59	6	0.21%
05/21/2002	2885	73	3	0.10%
05/22/2002	2388	43	1	0.04%
05/23/2002	2096	52	9	0.43%
05/24/2002	3510	100	3	0.09%
05/25/2002	296	23	0	0.00%
05/26/2002	0	0	0	0.00%
05/27/2002	296	15	13	4.39%
05/28/2002	2554	79	4	0.16%
05/29/2002	2233	53	2	0.09%
05/30/2002	2602	68	3	0.12%
05/31/2002	2229	72	6	0.27%
	178655	4503	189	0.11%

**Tennessee Regulatory Authority
Docket No. 97-00309
Exhibit KLA-7**

Transmittal Cover sheet for Ainsworth Exhibit KLA-7

Glossary of Terms

CCP	Change Control Process
CLEC	Competitive Local Exchange Carrier
CSR	Customer Service Record
DSL	Digital Subscriber Line
LCSC	Local Carrier Service Center
LSP	Local Service Provider
LSR	Local Service Request
NSP	Network Service Provider
OSS	Operations Support Systems
PIC	Presubscribed Interexchange Carrier
PSO	Pending Service Order
SOEG	Service Order Entry Gateway
UNE-P	Unbundled Network Element Platform
USOC	Universal Service Order Code